

AARON D. FORD  
Attorney General  
ROBERT DELONG, Bar No. 10022  
Deputy Attorney General  
State of Nevada  
Bureau of Litigation  
Public Safety Division  
100 N. Carson Street  
Carson City, Nevada 89701-4717  
Tel: (775) 684-1120  
E-mail: rdelong@ag.nv.gov

*Attorneys for Defendants*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

LAUSTEVEION JOHNSON,

Plaintiff,

vs.

J. YOUNGBLOOD , et al.,

Defendants.

Case No. 3:16-cv-00693-MMD-VPC <sup>CEC</sup>

**MOTION TO EXTEND THE DEADLINE TO  
FILE MOTIONS FOR SUMMARY  
JUDGMENT  
(First Request)**

Defendants D Aja, Isidro Baca, Ruben Diaz-Ramirez, Jo Gentry, Holly Skulstad, and Brian Williams, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, and Robert W. DeLong, Deputy Attorney General, hereby move for an extension to the motion for summary judgment deadline in this case because there is a pending Notice Regarding Intention to Dismiss (ECF No. 30). This motion is made and based upon the following Memorandum of Points and Authorities and all of the pleadings and papers on file herein.

**MEMORANDUM OF POINTS AND AUTHORITIES**

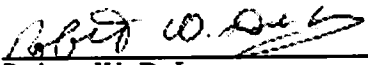
This is Defendants' first request for an extension of time to extend the deadline to file motions for summary judgment. The present deadline to file motions for summary judgment is Monday, January 28, 2019. Pursuant to Fed. R. Civ. P. 6(b)(1)(A), Defendants request this extension because key defendants in this matter, correctional officers involved in the alleged events, may be dismissed from the matter on February 7, 2019. This Court entered its Notice Regarding Intention to Dismiss Pursuant to Rule 4(m) of The Federal Rules of Civil Procedure (ECF No. 30) on January 8, 2019. The notice

1 states that this action may be dismissed without prejudice as to Defendants Mark Brown, Johnny  
2 Youngblood, Miller, and Correctional Officer Robinson unless proof of service is filed with the clerk  
3 by February 7, 2019. As of the date of this filing, undersigned counsel is not aware of any such filing.  
4 Defendants herein request this extension in an effort to promote judicial economy because they intend  
5 to file a single joint motion for summary judgment with all defendants remaining in the case.


6 Defendants assert that good cause exists for this Court to enlarge the time allowed for them to file a  
7 motion for summary judgment, and request that the deadline to file summary judgment motions be  
8 extended to no later than thirty (30) days from the deadline for Plaintiff to file a proof of service, Monday,  
9 March 11, 2019. This request is made in good faith and not for the purpose of delay. The Defendants  
10 respectfully submit that none of the parties will be prejudiced by the extension of time sought.

11 DATED this 28<sup>th</sup> day of January, 2019.

12 AARON D. FORD  
13 Attorney General

14 By:   
15 Robert W. DeLong  
16 Deputy Attorney General  
17 State of Nevada  
18 Bureau of Public Affairs  
19 Public Safety Division

20 *Attorneys for Defendants*

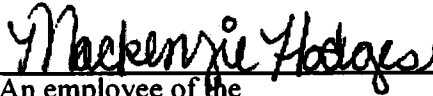
21 **IT IS SO ORDERED**  
  
22 **U.S. MAGISTRATE JUDGE**

23 DATED: 1/30/2019  
24  
25  
26  
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**CERTIFICATE OF SERVICE**

I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that on this 28th day of January, 2019, I caused to be deposited for mailing, a true and correct copy of the foregoing, **MOTION FOR EXTENSION OF TIME (FIRST REQUEST)**, on the following:

LAUSTEVEION JOHNSON #82138  
HIGH DESERT STATE PRISON  
P.O. BOX 650  
INDIAN SPRINGS, NV 89070

  
An employee of the  
Office of the Attorney General